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*National Consumer Telecom & Utilities*  
6 *Exchange, Inc.*

7  
8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

10 COURAGE ELKSHOULDER,

11 Plaintiff,

12 vs.

13 NATIONAL CONSUMER TELECOM &  
14 UTILITIES EXCHANGE, INC., INNOVIS  
DATA SOLUTIONS and CLARITY  
15 SERVICES, INC.,

16 Defendants.  
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**Case No. 2:24-cv-02281-EJY**

**JOINT MOTION FOR EXTENSION OF  
TIME FOR DEFENDANT NATIONAL  
CONSUMER TELECOM & UTILITIES  
EXCHANGE, INC. TO FILE ANSWER**

**FIRST REQUEST**

18 Defendant National Consumer Telecom & Utilities Exchange, Inc. ("NCTUE") has  
19 requested an extension of time to answer, move or otherwise respond to the Complaint in this  
20 matter, to which Plaintiff has no opposition. Accordingly, pursuant to LR IA 6-2, IT IS HEREBY  
21 STIPULATED AND AGREED to by and among counsel, that NCTUE's time to answer, move or  
22 otherwise respond to the Complaint in this action is extended from April 28, 2025 through and  
23 including **May 28, 2025**. The request was made by NCTUE so that it can have an opportunity to

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1 collect and review its internal files pertaining to the allegations in the Complaint, and Plaintiff  
2 approves. This stipulation is filed in good faith and not intended to cause delay.

3 Respectfully submitted, this 22<sup>nd</sup> day of April, 2025.

4 CLARK HILL PLLC

5 By: /s/ Gia N. Marina

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13 *Telecom & Utilities Exchange, Inc.*

**No opposition**

/s/ Gerardo Avalos

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*Attorneys for Plaintiff*

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17 IT IS SO ORDERED:

18   
United States Magistrate Judge

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20 DATED: April 22, 2025  
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